

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Attorney for Debtor, Johnny Sanchez

In Re:

JOHNNY SANCHEZ

Case No.: 17-25840

Judge: VFP

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following **(choose one)**:

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,

A hearing has been scheduled for _____, at _____.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☒ Certification of Default filed by Chapter 13 Trustee,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

- ☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ **Other (explain your answer):**

This office represents the Debtor, who was unable to appear in our office prior to the deadline to file opposition. However, the Debtor did become current with the Trustee by paying \$749 on 8/28/20 and \$749 on 9/3/20. Proof of this payment is attached. The Debtor now owes only the September 2020 payment. We respectfully request that the Court schedule a hearing on this matter.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: September 4, 2020

/S/ David G. Beslow, Esq.
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.



Case Number 1725840

Debtor Information

Debtor 1 JOHNNY SANCHEZ

Debtor 2

Trustee Information

Trustee Marie-Ann Greenberg

Status

Data Last Updated Sep 03, 2020

Total Paid into Plan \$26,162.00

Petition Filed on Aug 04, 2017

Debtor's Latest

Payments

EPAY STANDARD PLAN PAYMENT \$749.00 09/03/2020

EPAY STANDARD PLAN PAYMENT \$749.00 08/28/2020

EPAY STANDARD PLAN PAYMENT \$749.00 07/06/2020

CASE INFORMATION

Case Number 1725840
 Case Status ACTIVE
 NDC Case Status Active-Open
 Balance on Hand \$1,385.64
 Last Receipt Date 09/03/2020
 Last Receipt Amount \$749.00
 Last Disbursement Date 09/03/2020
 Total Paid into Plan \$26,162.00
 Total Paid to all Parties \$24,776.36
 Total Paid to Creditors

Filing Fee in Plan
 Filing Fee Paid to Date
 Date Petition Filed 08/04/2017
 Date Plan Filed 09/08/2017
 First 341 Meeting Date 09/26/2017
 Date Case Confirmed 11/08/2017
 Date Case Closed

Additional Parties In Interest

TRUSTEE INFORMATION

Trustee Name Marie-Ann Greenberg
 Trustee City Fairfield, NJ
 Amount Paid to Date \$1,485.49

DEBTOR INFORMATION

Debtor 1		Debtor 2
Debtor Name	JOHNNY SANCHEZ	Debtor Name
AKA		AKA
Direct Payment Amt	\$749.00	Direct Payment Amt
Direct Payment Frequency	MONTHLY	Direct Payment Frequency
Payroll Deduction Amt		Payroll Deduction Amt

PAYMENT SCHEDULE

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JUDGE/ATTORNEY INFORMATION

Judge Name Vincent F. Papalia
 Attorney Name GOLDMAN & BESLOW, LLC
 Attorney Fee in Plan
 Attorney Paid to Date
 Attorney Fee Paid Outside Plan

The values are

estimates, please contact your Attorney with any questions.

Total Delinquency Amt: \$1,498.00

Payroll
Deduction
FrequencyPayroll
Deduction
Frequency

PERIOD	DATE (MONTH/YEAR)	PAYMENT DUE	PAYMENT RECEIVED	PAYMENT DEFERRED	AMOUNT DUE
1	9/2017	\$700.00	<u>\$0.00</u>	0.00	\$700.00
2	10/2017	\$700.00	<u>\$700.00</u>	0.00	\$700.00
3	11/2017	\$705.00	<u>\$0.00</u>	0.00	\$1,405.00
4	12/2017	\$705.00	<u>\$1,410.00</u>	0.00	\$700.00
5	1/2018	\$705.00	<u>\$0.00</u>	0.00	\$1,405.00
6	2/2018	\$705.00	<u>\$0.00</u>	0.00	\$2,110.00
7	3/2018	\$705.00	<u>\$1,000.00</u>	0.00	\$1,815.00
8	4/2018	\$705.00	<u>\$1,815.00</u>	0.00	\$705.00
9	5/2018	\$705.00	<u>\$0.00</u>	0.00	\$1,410.00

PLAN STEPS

COURT DOCKET

DOCUMENTS AND FILES

START DATE	END DATE	NUMBER OF PAY PERIODS	PAYMENT AMOUNT	PAYMENT FREQUENCY
09/01/2017	10/31/2017	2	\$700.00	MONTHLY
11/01/2017	02/28/2019	16	\$705.00	MONTHLY
03/01/2019	08/31/2022	42	\$749.00	MONTHLY